



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/JAM/AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 13, 2021

By ECF

Zachary Margulis-Ohnuma
Law Office of Zachary Margulis-Ohnuma
260 Madison Avenue, 17th Floor
New York, NY 10016

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1)(EK)

Dear Counsel:

The government writes to memorialize several pre-trial disclosures.

On April 12, 2021, the government provided material pursuant to 18 U.S.C. § 3500 for witnesses who may testify during the government's case-in-chief at trial. The government provided the bulk of this material via USAFx and sent an external hard drive with some additional material via FedEx to the home address of the defense paralegal. The § 3500 material is designated SENSITIVE DISCOVERY MATERIAL and is subject to the protective order in this case. This production supplements the government's previous productions of § 3500 material. The government also notes that it previously produced documents containing prior statements of witnesses in conjunction with the Rule 16 discovery in this matter. The government requests production of materials pursuant to Federal Rule of Criminal Procedure 26.2 from the defendant.

On April 12, 2021, the government also provided additional and revised exhibits that it may use during the government's case-in-chief at trial. The government provided this material via USAFx.

Finally, you requested additional information about the representative from Platform 4 who will testify regarding the logs and data from the company. The government provided you with § 3500 material for that witness on April 9, 2021. In further response to your request and as a courtesy, the government encloses additional information regarding the representative from Platform 4 and the representative from Platform 2 who are expected to testify at trial. These materials supplement the government's previous disclosures regarding

these witnesses, set forth in letters dated January 27, 2020 and January 30, 2021, and in their § 3500 material.

Respectfully submitted,

MARK J. LESKO
Acting United States Attorney

By: /s/Saritha Komatireddy
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cc: Clerk of the Court (EK) (by ECF)
All counsel of record (by ECF)